

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:18CR395
)	
Plaintiff,)	JUDGE JACK ZOUHARY
)	
v.)	
)	
EL'SHAWN WILLIAMS,)	<u>MOTION FOR LEAVE TO FILE TRIAL</u>
)	<u>BRIEF UNDER SEAL</u>
Defendant.)	
)	
)	

Now comes the United States of America, by and through its counsel, Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Michael J. Freeman, Assistant United States Attorney, and Dana Mulhauser, Trial Attorney for the Civil Rights Division, and respectfully requests this Court to grant the government permission to file its trial brief under seal. The brief contains a list of proposed witnesses, including the victim.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Michael J. Freeman
Michael J. Freeman (OH: 0086797)
Assistant United States Attorney
Four Seagate, Suite 308
Toledo, OH 43604
(419) 241-0724
(419) 259-6360 (facsimile)
Michael.Freeman2@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April 2019 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Michael J. Freeman

Michael J. Freeman
Assistant U.S. Attorney